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                       UNITED STATES DISTRICT COURT
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                              DISTRIC OF NEVADA
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   SARI ZAGORSKI, individually and on ) Case No. 2:16-cv-00723-JAD-CWH
17
    Behalf of All Others Similarly Situated, )
18
                                          SECOND JOINT STIPULATION TO
                     Plaintiff,
                                          EXTEND ANSWER DEADLINE
19
20
         VS.
21
    FOCUS RECEIVABLES
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    MANAGEMENT, LLC,
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                     Defendant.
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Second Joint Stipulation to Extend Answer Deadline

NOW INTO COURT, through undersigned counsel, comes plaintiff, Sari Zagorski

this Second Joint Stipulation to Extend the Answer deadline to the Complaint filed by Plaintiff, Sari Zagorski, and states:

1. On or about April 1, 2016, Plaintiff filed her Complaint in this Honorable Court.

("Plaintiff"), and Defendant, Focus Receivables Management, LLC ("Focus"), who files

- 2. On April 4, 2016, Plaintiff served her Complaint on Focus.
- 3. Focus' original response deadline was April 25, 2016.
- 4. Plaintiff, through counsel, originally agreed to allow Focus a 21 day extension, or until May 16, 2016, to file Responsive Pleadings to Plaintiff's Complaint.
- 5. The parties have been in close contact and have exchanged information in furtherance of a speedy, amicable resolution. The parties would like to continue to make a speedy, amicable resolution the focus for a short time longer.
- 6. Consequently, Plaintiff, through counsel, has agreed to allow Focus an additional 30 day extension, or until June 15, 2016, so that the parties can focus their efforts on an amicable resolution before proceeding with litigation.
 - 7. There are no pending hearings or matters currently before the Court.

WHEREFORE, plaintiff, Sari Zagorski, and defendant, Focus Receivables Management, LLC, respectfully stipulate to and request this Court grant a second

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1 extension through and including June 15, 2016, to file Responsive Pleadings to Plaintiff's 2 Complaint, and for such other relief as this Court deems proper. 3 Dated: May 16, 2016. 4 5 6 /s/ Danny J. Horen /s/ Shannon G. Splaine 7 8 Danny J. Horen, Esq. Shannon G. Splaine, Esq. Spartan Law, LLC (NV Bar No. 8241) 7854 West Sahara Avenue LINCOLN, GUSTAFSON & 10 Las Vegas, NV 89117 CERCOS, L.L.P. Telephone: (702) 625-1539 11 3960 Howard Hughes Parkway, Facsimile: (702) 548-4459 Suite 200 12 Las Vegas, NV 89169 danny@spartanlaw.us Attorney for Plaintiff, Telephone: (702) 257-1997 13 ssplaine@lgclawoffice.com Sari Zagorski 14 15 and 16 James K. Schultz, Esq. (NV Bar No. 10219) 17 SESSIONS, FISHMAN, NATHAN 18 & ISRAEL 55 W. Monroe St., Ste.1120 19 Chicago, IL 60603 20 Telephone: (312) 578-0990 jschultz@sessions-law.biz 21 22 Attorneys for Defendant, Focus Receivables Management, LLC 23 24 25 26 27

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   Behalf of All Others Similarly Situated, )
17
                                          ORDER GRANTING SECOND JOINT
18
                     Plaintiff,
                                          STIPULATION TO EXTEND
                                          ANSWER DEADLINE
19
         VS.
20
    FOCUS RECEIVABLES
21
    MANAGEMENT, LLC,
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23
                     Defendant.
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Order Granting Second Joint Stipulation to Extend Answer Deadline

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Having considered the Joint Stipulation of Plaintiff, Sari Zagorski, and Defendant, Focus Receivables Management, LLC's to Extend the Answer Deadline, IT IS SO ORDERED:

That Focus Receivables Management, LLC has up to and including June 15, 2016 to file responsive pleadings.

DATED: May 20, 2016

UNITED STATES MAGISTRATE JUDGE